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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of

Telocator Petition For
Rulemaking to Amend Part 22 of
the Commission's Rules
Concerning the Use of 930-931
MHz For An Advanced Messaging
Service

RM No. 7617 ✓

COMMENTS OF NORTHERN TELECOM INC.

Northern Telecom Inc. ("Northern Telecom"), by its attorneys, hereby comments on the petition for rulemaking submitted by Telocator.^{1/} Northern Telecom, headquartered in Nashville, Tennessee, is the second largest telecommunications manufacturer in the U.S. The company employs more than 22,000 people in the U.S. in twelve manufacturing plants, thirteen research and development centers, and in marketing, sales and service offices across the country. The company supplies systems to businesses, universities, local, state and federal governments, the telecommunications industry, and other institutions worldwide. Northern Telecom is extensively involved

^{1/} Telocator Petition For Rulemaking to Amend Part 22 of the Commission's Rules Concerning the Use of 930-931 MHz For An Advanced Messaging Service, RM No. 7617, Public Notice Report No. 1836, February 7, 1991.

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in the development and refinement of mobile telecommunications, including wireless PBXs, cellular switches and networks, the interconnection of mobile services with landline switches, and the new personal communications services ("PCS").

Comments previously submitted by Northern Telecom and many others in response to the Commission's PCS Notice of Inquiry^{2/} provided strong support for the demand for such services and the pressing need to allocate spectrum to enable the many interested parties to participate in satisfying both existing and future demands.^{3/} An early PCS spectrum allocation would also provide a timely opportunity for U.S. manufacturers and service providers to participate in the global market place for this emerging technology. Responses to the inquiry also identified the need to define longer term plans for evolution of these capabilities to a very broad customer base, including both residential and business users.

Northern Telecom noted that technology exists today to satisfy short term needs, including business applications that require mobility within buildings, behind PBX and key systems,

2/ Amendment of the Commission's Rules to Establish New Personal Communications Systems, 5 FCC Rcd 3995 (1990).

3/ See generally, Northern Telecom Response to the Second Notice of Inquiry Relating to Preparation for the International Telecommunication Union World Administrative Radio Conference for Dealing with Frequency Allocations in Certain Parts of the Spectrum, GEN. Docket No. 89-554, December 3, 1990; Northern Telecom Response to Notice of Inquiry Relating to Establishment of New Personal Communications Services, Docket No. 90-314, October 1, 1990.

and in public locations, should a minimal amount of spectrum be made available. In their responses, many, including Northern Telecom, envisaged PCS to include two-way communications, voice and data capabilities, common numbering plan, encryption, and spectrum reuse. Indeed, each of the services proposed by Telocator under advanced messaging services ("AMS") would fall within the broader range of PCS as envisioned by Northern Telecom and others.

Telocator's request for allocation of the 930-931 MHz band for AMS is inconsistent with Northern Telecom's proposal to use that band for PCS. Northern Telecom believes, however, that its proposal to utilize the 930-931 MHz band for PCS would better serve the public interest than the allocation requested by Telocator by providing a wider range of services to a larger customer base, and making those services available sooner.

Telocator claims in its petition that the 930-931 MHz band is not suitable for "CT-2" services, characterized by Telocator as the one-way, U.K. system.^{4/} Telocator also argues that the Reply Comments in the PCS Proceeding confirm that this spectrum is undesirable for such services. Telocator even goes so far as to assert that Northern Telecom "continue(s) to request more suitable spectrum, but prefer(s) the 900 MHz spectrum to

4/ Telocator Petition at pp. 12 and 17. As indicated earlier, however, Northern Telecom and others anticipate that the early PCS services will be two-way and in other respects more robust than the U.K. Telepoint model.

nothing at all." (Emphasis added.)^{5/} Despite Telocator's claim, there was nothing in Northern Telecom's earlier filings that indicated or implied that the 930-931 MHz band was in any manner unsuitable for PCS.^{6/} Indeed, it facilitates the early availability of such services.

Northern Telecom's proposal for allocation of the 930-931 MHz band for PCS would better serve the public interest than Telocator's request for assignment of that spectrum to AMS. The allocation proposed by Northern Telecom will also allow for the early implementation of PCS in the U.S., with attendant foreign trade benefits, while longer term domestic and international allocation issues are resolved.

In sum, given the enormous potential benefits and demand for PCS, Northern Telecom believes that the Commission should not take any actions now that might foreclose the early implementation of these services. Therefore, Northern Telecom urges the Commission to focus its energies and resources on

^{5/} Telocator Petition at p. 19.

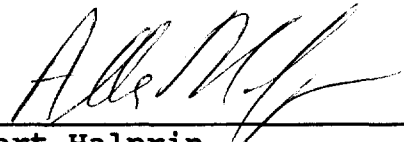
^{6/} In its petition for rulemaking, Telocator mischaracterizes Northern Telecom's position. What Northern Telecom actually indicated in its earlier comments was:

Northern Telecom's initial suggestion that the 930-931 MHz and 940-941 MHz could be well utilized for this application was echoed by several other commenters, although Northern Telecom would not object if other suitable frequencies were specified. The PCI sharing techniques described in Northern Telecom's initial comments in this proceeding are not dependent on the particular frequencies. (Emphasis added)

Reply Comments of Northern Telecom in GEN Docket No. 90-314, January 17, 1991 at pp. 7-8.

determining the evolution to PCS as detailed in Northern Telecom's and others' earlier filings, and deal with Telocator's request only after addressing these broader issues.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Laura E. Magner hereby certify that on the 11th day of March, 1991, a true copy of the foregoing Comments of Northern Telecom Inc. was mailed, postage prepaid, to Richard E. Wiley, Wiley, Rein & Fielding, 1776 K Street, N.W., Washington, D.C. 20005, counsel for Telocator.



Laura E. Magner